



U.S. Department of Justice

Michael J. Sullivan
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

February 23, 2005

Leslie Feldman-Rumpler, Esquire
101 Tremont Street, Suite 708
Boston, MA 02109

Re: United States v. Jill Doucette
Criminal No. 04-10135-GAO

Dear Ms. Feldman-Rumpler:

This letter is in response to your "Motion to Join in Motion of Thomas Scola for Discovery and for Additional Discovery." I believe you were provided the "bench notes" and other materials from the DEA laboratory concerning the testing of the drugs in this case. If you need additional materials from the laboratory, please let me know at your first opportunity.

In response to your request for "a statement by the government as to the quantity of controlled substances with which she had direct involvement, and the basis for that position" the United States provides the following response: Ms. Doucette had "direct involvement" with the sales of heroin which occurred on February 10, 2004 (see Count Seven of the Indictment-net weight of 9.7 grams), March 18, 2004 (see Count Twelve-net weight of 8.1 grams), March 24, 2004 (see Count Thirteen-8.9 grams), and March 30, 2004 (see Count Fourteen-8.1 grams). The basis for the United States's position that the defendant had "direct involvement" in the above-listed deals is her active participation in those deals as described in the reports previously provided to the defense.

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Please be aware that the United States may seek to have the defendant held responsible for a greater quantity of heroin based on what was reasonable foreseeable to her as a member of the conspiracy charged in Count One of the Indictment.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ David G. Tobin
DAVID G. TOBIN
Assistant U.S. Attorney